1	MELINDA HAAG (CABN 132612) United States Attorney
2	, and the second
3	MIRANDA KANE (CABN 150630) Chief, Criminal Division
4	ADAM A. REEVES (NYBN 2363877)
5	Assistant United States Attorney
6	450 Golden Gate Avenue, Box 36055 San Francisco, California 94102
7	Telephone: (415) 436-7157 Facsimile: (415) 436-7234
8	Adam.Reeves@usdoj.gov
	Attorneys for Plaintiff
9	UNITED STATES DISTRICT COURT
10	NORTHERN DISTRICT OF CALIFORNIA
11	SAN FRANCISCO DIVISION
12	UNITED STATES OF AMERICA,) Case No. 11-0625 EMC
13	Plaintiff,) STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME
14	ORDER EXCLUDING TIME v.
15	BASSAM YACOUB SALMAN,
16	Defendant.
17	
18	WHEREAS, on October 26, 2011, the United States produced approximately 937,000
19	pages of documents and other materials to counsel for the defendant;
20	WHEREAS, counsel for the defendant needs time to review the discovery;
21	WHEREAS, a failure to grant the continuance would deny defense counsel the reasonable
22	time necessary for effective preparation, taking into account the exercise of due diligence, and
23	under the circumstances, the ends of justice served by a reasonable continuance outweigh the
24	best interest of the public and the defendant in a speedy trial;
25	WHEREAS, defendant Bassam Salman consents to the exclusion of time from February
26	8, 2012 to April 18, 2012;
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28	STIPULATION AND [PROPOSED] ORDER EXCLUDING TIME United States v. Salman, Case No. 11-0625 EMC

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THEREFORE, it is hereby stipulated by and between the parties, through their respective counsel of record, that the period of time from February 8, 2012 to April 18, 2012 shall be excluded in computing the time within which the trial of the offenses alleged in the Indictment must commence under Title 18, United States Code, Section 3161.

DATED: February 9, 2012 **MELINDA HAAG** United States Attorney

/s/

Adam A. Reeves

Assistant United States Attorney

IT IS SO ORDERED

Judge Edward M. Chen

DATED: February 9, 2012

/s/

Gail Shifman, Esq. Counsel to Bassam Salman

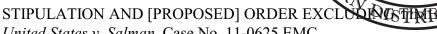
[PROPOSED] ORDER EXCLUDING TIME

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED that:

The ends of justice are served by finding that a continuance from February 8, 2012 to April 18, 2012 outweighs the best interests of the public and the defendant in a speedy trial and the prompt disposition of criminal cases and the Court concludes that the exclusion of time from February 8, 2012 to April 18, 2012 should be made under Title 18, United States Code, Sections

3161(h)(7)(B)(iv).

DATED: 2/14/12



United States v. Salman, Case No. 11-0625 EMC